



STATE OF NORTH CAROLINA  
DEPARTMENT OF TRANSPORTATION

JAMES B. HUNT, JR.  
GOVERNOR

P.O. BOX 25201, RALEIGH, N.C. 27611-5201

R. SAMUEL HUNT III  
SECRETARY

March 7, 1995

MEMORANDUM TO: Ms. Chrys Baggett, Director  
State Clearinghouse  
Department of Administration

FROM: H. Franklin Vick, P. E., Manager  
Planning and Environmental Branch *H.F. Vick*

SUBJECT: Record of Decision for the Greensboro Eastern/Northern  
Urban Loop, from north of the interchange with I-85 and  
the proposed I-85 Bypass east of Greensboro, to Lawndale  
Drive north of Greensboro, Guilford County, State Project  
No. 6.498003T, TIP No. U-2525, NC-EIS-92-01

**A. Decision**

The proposed action is the construction of the Greensboro Eastern/Northern Urban Loop, a multi-lane freeway, from north of the interchange with I-85 and the proposed I-85 Bypass to Lawndale Drive north of Greensboro, a distance of approximately 12.5 miles. Full control of access is proposed. The selected alternative for the project is the Middle Alternative. This alternative and its anticipated impacts are fully discussed in the Draft Environmental Impact Statement (DEIS) and the abbreviated Final Environmental Impact Statement (FEIS).

This project is included in the 1995-2001 Transportation Improvement Program.

**B. Alternatives Considered**

A No-Build alternative; a Transportation System Management alternative; a Multi-Modal Systems alternative; and three new location alternatives, the Western Alternative, the Eastern Alternative, and the Middle Alternative, were considered. In addition, three improvement options for US 70 in the vicinity of the Eastern/Northern Urban Loop were considered.

The No-Build Alternative assumes the Greensboro Urban Loop is not in place, but that other elements of the 1989 Greensboro Urban Area Thoroughfare Plan are implemented. The Transportation System Management (TSM) Alternative consists of improvements to existing highways to allow traffic to



flow more efficiently. Multi-Modal System Alternative consists of expanding transit service and ride-sharing to serve transportation demand in the study area.

The Western Alternative crosses approximately 8.4 acres of the permitted White Street Landfill, relocates approximately 364 residences and impacts approximately 34 acres of wetlands. The City of Greensboro Public Works Department voiced strong objection to consideration of the landfill for roadway use. Based on these considerations, the North Carolina Department of Transportation eliminated the Western Alternative from further consideration. The Western Alternative was not presented at the Corridor Public Hearing nor was it addressed in the FEIS.

The Eastern and Middle Alternatives are 13.0 and 12.5 miles in length. The Eastern/Northern Urban Loop is proposed as a four-lane divided freeway on new location with full control of access and interchanges at Fourmile Loop (relocated US 70), Huffine Mill Road, US 29, Yanceyville Road, Elm Street Extension and Lawndale Drive.

Many important factors, including environmental, social, economic effects, and traffic service, were considered in selecting the Middle Alternative as the Preferred Alternative. The Middle Alternative reduces the noise impact on the McLeansville Community and the number of relocations. The Middle Alternative has 119 receptors exceeding the FHWA Noise Abatement Criteria, while the Eastern Alternative has 168 receptors exceeding the criteria. The Middle Alternative requires 307 residential and nine business relocations and the Eastern Alternative requires 311 residential and 10 business relocations. The greater noise and relocation impacts of the Eastern Alternative generally are located in the rural McLeansville Community.

The Eastern Alternative impacts fewer acres of wetland than the Preferred Alternative, with 8.1 acres on the Eastern and 11.2 acres on the Preferred Alternative. Wetlands impacted by the Preferred Alternative are of a higher quality, with 8.6 acres of hardwood forest impacted by the Preferred versus 2.0 acres of hardwood forest impacted by the Eastern Alternative. The Middle Alternative requires 262 acres of prime farmland, while the Eastern Alternative requires 317 acres. Neither alternative impacts any National Register historic architectural or archaeological sites. There are no currently Federally-listed threatened or endangered or proposed threatened or endangered plant or animal species in the project impact area. Both alternatives effect one potential hazardous materials site. The J. P. Stevens Facility is located at the US 29 interchange, partially within the proposed right of way of the Preferred Alternative. Soil and groundwater contamination are present at the site. Relocation of the proposed interchange is not feasible. Since construction of this section of the Urban Loop is not scheduled until after 2001, it is anticipated remediation clean-up will be completed prior to right of way acquisition.

The Middle Alternative aligns more directly with the proposed I-85 Bypass interchange which was shifted westward to avoid a major business, Replacements Limited. The Eastern Alternative introduces severe design problems at this interchange.

Public opposition to the Eastern Alternative was voiced at the Citizens Informational Workshops and at the Corridor Public Hearing and through several hundred letters from residents of the area. Public support generally favors the Preferred Alternative.

In the vicinity of the proposed interchange with the Urban Loop, existing US 70 is on a sharp horizontal curve and passes under a narrow railroad bridge. Improvements to US 70 are necessary to allow a better horizontal alignment and avoid design problems caused by the railroad. Following the Corridor Public Hearing and selection of the Preferred Alternative, it was determined improvements to US 70 in the vicinity of the proposed interchange extend beyond the boundaries of the original study area, and therefore were addressed in the FEIS.

The design of the Northern/Eastern Urban Loop/US 70 interchange includes relocating US 70 to Fourmile Loop through the area of the proposed interchange. No alternative to this relocation is feasible. Three options for tying existing US 70 into Fourmile Loop (relocated US 70) and providing access to existing development were considered. The selected option (Option 2) has fewer residential and business relocations, and less wetland impact and floodplain encroachment than Option 1. Option 2 avoids two potential hazardous materials sites impacted by Option 1. Option 2 and Option 3 would result in the same wetland impacts. However, Option 2 provides a better and safer design than Option 3.

### **C. Measures to Minimize Harm**

Based on the design-year traffic noise analysis, noise abatement is determined to be prudent and feasible for the design-year conditions along the southern edge of the Loop between Elm Street and Lawndale Drive. The estimated cost for this barrier is \$382,980 and would mitigate noise at 36 receptors (\$10,638 per receptor).

The Preferred Alternative will impact 11.2 acres of wetland including 8.6 acres of high quality hardwood forest. In addition, improvements to US 70 will impact 2.87 acres of wetlands including 1.2 acres of hardwood forest, for a total of 14.07 acres of wetlands impacted by the proposed project.

Efforts will be made in the preliminary design phase to avoid and minimize wetland areas as practicable. Mitigation of unavoidable wetland losses will be coordinated with the U.S. Fish and Wildlife Service and the U.S. Army Corps of Engineers (COE). Preliminary investigation has identified the most suitable sites for mitigation as the agricultural areas adjacent to the unnamed tributary of North Buffalo Creek north of Hines Chapel Road and adjacent to South Buffalo Creek north of McConnell Road. A detailed mitigation proposal will be developed in coordination with the COE during the permit phase.

The Preferred Alternative will encroach upon the 100-year floodplain of South Buffalo Creek (11.0 acres south of US 70) and North Buffalo Creek (5.5 acres near Camp Burton Road). In addition, the proposed improvements to US 70 will encroach on approximately 4.7 acres of the South Buffalo Creek

floodplain. A number of smaller stream crossings also are necessary. While no practicable alternative exists that would avoid any encroachment within floodplain, floodplain impacts will be minimized through adequate hydraulic design of structures and culverts.

No archaeological sites or historic structures listed in or eligible for listing in the National Register of Historic Places are impacted by the Preferred Alternative. This project is in compliance with GS 121(12)a.

There are no currently Federally-listed threatened or endangered or proposed threatened or endangered plant or animal species in the project impact area.

Construction related impacts associated with the proposed action will be minimized through erosion and sedimentation control measures as described in the Federal Aid Highway Program Manual (FHPM) 6-7-3 and the North Carolina Administrative Codes, Chapter 4 Sedimentation Control. NCDOT "Best Management Practices for the Protection of Surface Waters" will be used for highway construction. All practical measures will be taken to minimize environmental harm.

#### **D. Monitoring and Enforcement Program**

The construction staff of NCDOT will enforce all pertinent specifications and contract provisions which are in accordance with the intent of this EIS and the welfare of the public.

#### **E. Environmental Commitments**

- (1) Noise abatement measures will continue to be considered throughout the design phase of the project.
- (2) The design of any necessary drainage structures at greenways will be coordinated with the Guilford County Parks and Recreation Department.
- (3) Any underground storage tanks discovered during construction will be reported to the North Carolina Division of Environmental Management.
- (4) The final designs will be coordinated with appropriate state and local officials and the Federal Emergency Management Agency (FEMA) to assure compliance with FEMA, state, and local floodway and floodplain regulations.
- (5) NCDOT's "Best Management Practices for Protection of Surface Waters" will be implemented, where applicable, including hazardous spill catch basins in water supply watershed critical areas where the roadway crosses the water supply.
- (6) Mitigation for unavoidable wetland loss will be provided through implementation of a wetland mitigation plan developed during the permitting phase of the project.

- (7) Geodetic survey control monuments will be located during design, and the U.S. Coast and Geodetic Survey and North Carolina Geodetic Survey will be notified of their location.
- (8) Bridges will be considered during the design phase at major waterway and floodplain crossings.
- (9) Recommendations to restore stream segments to resemble the destroyed habitat will be considered where practicable. Banks and beds of relocated channels will be stabilized with vegetation or other protective devices as practicable, including consideration of using logs to line banks.

#### **F. Comments on the Final EIS**

The Final Environmental Impact Statement is in conformance with the applicable provisions of 23 CFR 771 and it satisfactorily covers the anticipated environmental impacts, including physiographic and cultural effects.

Written responses to comments from agencies on the FEIS are summarized below. Copies of the comments are attached.

Department of Environment, Health and Natural Resources, Division of Environmental Management

Letter dated December 9, 1994

**Comment:**

"DEM still prefers the eastern alternative because it has the least impact to high quality wetlands, lowest total wetland impacts and the lowest total cost. In addition, displacements are equal to DOT's preferred alternative (middle)."

**Response:**

The Eastern Alternative has greater noise and community cohesion impacts on the rural McLeansville Community. Considerable opposition to the Eastern Alternative was voiced by the majority of speakers at the Corridor Public Hearing and through 12 letters, 354 post cards, and a petition with 87 signatures received by the NCDOT from the residents of McLeansville. In order to align with the I-85/I-85 Bypass interchange, the Eastern Alternative would require a sharp curve to the east just north of I-85, resulting in an undesirable interchange design. The Middle Alternative reduces social impacts and better serves major generators of heavy truck traffic located on US 70.

**Comment:**

"DEM is concerned that neither the City of Greensboro nor DOT protected the thoroughfare alignment near I-95 (I-85). If Replacements Limited had not been constructed, the eastern alternative would not have had the engineering constraints forcing the middle alignment to be chosen. What measures can be taken to prevent a similar occurrence?"

Response:

Local governments and NCDOT are limited regarding right of way protection for roads shown on adopted thoroughfare plans since environmental studies are unavailable at the thoroughfare planning stage. Replacements Limited was constructed after environmental studies on the I-85 Bypass were started but prior to selection of the Preferred Alternative. Public opposition to the Eastern Alternative was also a deciding factor in the selection of the Middle Alternative as the Preferred Alternative. A corridor protection map will be filed to protect right of way for the future road.

Comment:

"There were no discussions for improvements to US 70 in the DEIS. This prevented our agency from commenting on the alternatives. Therefore DEM requests that a supplemental document be written to present the wetland quality and quantity (quantity) for the US 70 improvements."

Response:

An interchange with US 70 is an integral part of this project. Three possible options for tying existing US 70 into Fourmile Loop (relocated US 70) and providing access to existing development are described in the FEIS. The selected option (Option 2) requires fewer residential and business relocations, avoids two potential hazardous material sites, and has less wetland impact and floodplain encroachment than Option 1. Option 2 and Option 3 would result in the same wetland impact. However, Option 2 allows a better design than Option 3 by avoiding a sharp "S" curve in a relocated section of existing US 70.

The impact on wetland quantity and quality of the proposed US 70 improvements are discussed in the FEIS (pages 28 and 29) and in Section C of this Record of Decision (ROD). The US 70 improvements impact 2.87 acres of wetlands in five separate sites. Hardwood forest comprises 1.2 acres and scrub-shrub comprises the remaining 1.67 acres of this taking. This acreage is in addition to the 11.2 acres of wetland impacted by the Loop, for a total impact of 14.07 acres.

Comment:

"As stated above, DEM prefers the eastern alternative. However, DEM will concur with a middle alternative if DOT commits to install, sign, and maintain hazardous spill catch basins at all water supply (WS) stream crossings. In addition, upfront mitigation will be necessary to protect water quality since the wetland impacts on the middle alternative are providing significant uses."

Response:

See Section E, Environmental Commitment No. 5, page 4. The first section of the Eastern/Northern Urban Loop is scheduled to be let to construction in September, 1996. The schedule does not allow time to have wetland mitigation in place prior to construction. A wetland mitigation plan

will be developed in consultation with the U.S. Army Corps of Engineers and DEM, and will be implemented concurrently with construction.

Guilford County Planning and Development Department  
Letter dated November 1, 1994

Comment:

"No provision for extending Knox Road across the Eastern Loop to McConnell Road."

Response:

Extension of Knox Road to McConnell Road is not within the limits of the Eastern/Northern Urban Loop project. However, the extension was considered in the preliminary design of the I-85/I-85 Bypass Interchange. The request for the extension was not approved because of the high cost of the bridges necessary to grade separate Knox Road within the I-85/I-85 Bypass interchange area.

Comment:

"Option 3 appears to be the best option for the Urban Loop and US 70."

Response:

Option 3 was rejected because it involves construction of an "S" curve in existing US 70. The selected option provides a safer design.

Comment:

"Cone Blvd. will be eventually extended as a four (4) lane thoroughfare with a divided median but it is not shown as intersecting at an interchange with the Urban Loop."

Response:

The Cone Boulevard Extension is in the Greensboro Urban Area Thoroughfare Plan, but is currently not in the Transportation Improvement Program. The design of the Urban Loop does not preclude construction of the Cone Boulevard Extension interchange in the future.

Comment:

"The entire Eastern Urban Loop from US 29-N to I-85 needs to be constructed as a top priority project, rather than just the I-85 to US 70 portion."

Response:

No response necessary.

North Carolina Department of Cultural Resources Division of Archives and History  
Letter dated November 14, 1994

Comment:

"As noted in our memorandums of October 21, 1992 and December 9, 1992 (attached), it is our opinion that Section 106 of the National Historic Preservation Act applies to this project and that use of the Corps of Engineers Appendix C procedures is inappropriate. We again recommend that historic resources surveys be conducted within the area of potential effect to locate potentially eligible sites and properties which may be effected."

Response:

This is a State funded project and is therefore subject to compliance with GS 121(12)a. Historic architectural and archaeological surveys will be conducted in permit areas as required by the Army Corps of Engineers. See FEIS Section 7, pages 40 and 41.

North Carolina Wildlife Resources Commission  
Letter dated December 16, 1994

Comment:

"The subject document adequately discusses benefits, social impacts, and traffic analysis of the final build alternatives. The document also describes anticipated impacts to natural resources from construction of the preferred alternative. However, the document does not adequately describe impacts that will result from the US 70 improvements nor the justification for selecting the middle alignment as the preferred alternative."

Response:

The FEIS describes urban and community impacts, air quality impacts, noise, water quality, hydrology and floodplain management, natural systems, protected species, farmlands, wetland impacts, hazardous materials sites, mineral resources, and cultural resources within the affected area of the proposed US 70 improvements. (See response to Department of Environment, Health and Natural Resources (DEHNR), December 9, 1994.)

The justification for selecting the Middle Alternative as the Preferred Alternative is discussed in response to comments by DEHNR, December 9, 1994.

Comment:

"The discussion of the US 70 improvements is also problematic. it is unclear if the wetland impacts associated with the US 70 improvements are included in the totals in Table S-1."



Response:

Wetland impacts associated with US 70 improvements are not reflected in Table S-1. Table S-1 lists impacts associated with the Northern/Eastern Loop. Wetland impacts for the US 70 improvements are described in Section 5.0, subsection 8. of the FEIS. As discussed in Section C of this ROD, a total of 14.07 acres of wetland will be impacted by the Loop and the US 70 improvements.

Comment:

"Agencies were also not given an opportunity to comment on the selected alternative for the US 70 improvements. A discussion of the need for the US 70 improvements, the reason this is included in U-2525 and not a separate project, and construction methods that would reduce wetland impacts should be included in an addendum to the FEIS. The possibility of removing the existing bridge over South Buffalo Creek should also be discussed. This site may provide an opportunity for wetland restoration."

Response:

An interchange with US 70 has been an integral part of this project from the beginning. The proposed improvements to US 70 are needed to connect the proposed interchange to existing US 70. Further response to the first two comments are addressed in the response to DEHNR, December 9, 1994, and Sections B and C of this ROD.

Removal of the existing US 70 bridge and embankments at South Buffalo Creek was investigated as a potential mitigation site. The investigation determined the bridge needs to remain in place to provide access to US 70 for an existing business, a fuel oil distributor, located on Fourmile Loop. Removal of the existing South Buffalo Creek bridge would require oil tanker trucks to proceed west on an unpaved section of Fourmile Loop in order to access US 70. This would result in trucks crossing the Southern Railroad tracks at-grade. These tracks are used by high speed Amtrak trains. The current speed limit for Amtrak trains at this crossing is 59 miles per hour, however, an increase in speed to 69 miles per hour is planned. The at-grade crossing of fully loaded tanker trucks would create a potentially hazardous situation. An accident could result in an explosion, fire, and possible spill of fuel oil into the creek.

Comment:

"The document fails to describe the need for stream relocation/channelization that would result from the proposed construction. We feel this information would have been useful in our review of this project. A comparison of quality wetland impacts for each alternative and where these impacts occur would have been useful in the alternatives analysis. Further discussion of wetland impact minimization is also recommended.

Due to the selection of the middle alignment as the preferred alternative and the topics that need further discussion, we recommend this information be presented in an addendum to the FEIS."

Response:

Stream relocation/channelization is discussed on page IV-24 and shown on Table IV-9 of the DEIS. The Preferred Alternative requires the least rechannelization of the three detailed study alternatives. Approximately 800 feet of the Richland Creek tributary at the Elm Street interchange and approximately 200 feet of Richland Creek at the Lawndale Drive interchange will require a channel change. This distance will be minimized as practicable in preliminary design. Wetland impacts are discussed on page IV-32 and wetland sites are listed by quality and alternative on Table IV-12 of the DEIS. Figure III-5 of the DEIS shows the location of wetland sites. As required by the U. S. Army Corps of Engineers stepdown procedure, impacts to wetlands will be avoided and minimized to the maximum extent practicable. The unavoidable wetland impacts will be mitigated by enhancement, restoration, creation, or other method as determined in consultation with the U. S. Army Corps of Engineers.

Department of Environment, Health and Natural Resources, Staff Forester  
Letter dated October 12, 1994

Comment:

"It looks like the Middle Alternative has been selected as the preferred one. 288 acres of woodland will be impacted. We hope the final design and actual impact will be less. Our forestry concerns have been addressed."

Response:

No response needed.

Piedmont Triad Council of Governments  
Letter dated October 20, 1994

Comment:

"Greensboro Department of Transportation previously submitted detailed comments to the State DOT. GDOT would encourage NCDOT to indicate future interchange with Cone Blvd. extension as shown on Greensboro Urban Area Thoroughfare Plan."

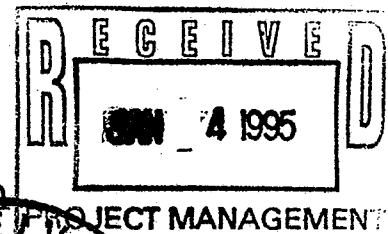
Response:

See the response to the Guilford County Planning and Development Department, dated November 1, 1994.

*Cinelly Shaver*



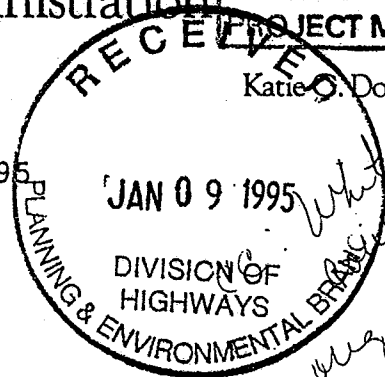
North Carolina  
Department of Administration



James B. Hunt Jr., Governor

Katie G. Dorsett, Secretary

January 3, 1995



Mr. Whit Webb  
N.C. Department of Transportation  
Program Development Branch  
Transportation Building  
Raleigh, North Carolina 27611

Dear Mr. Webb:

Re: SCH File #95-E-4220-0221; Final Environmental Impact Statement  
- Eastern/Northern Urban Loop in Greensboro (TIP #U-2525)

The above referenced environmental impact information has been reviewed through the State Clearinghouse under the provisions of the North Carolina Environmental Policy Act.

Attached to this letter are comments made by state/local agencies in the course of this review. Because of the nature of the comments, it is recommended that supplemental information addressing the attached concerns be submitted to this office for further environmental review.

Best regards.

Sincerely,

*Chrys Baggett*

Ms. Chrys Baggett, Director  
State Clearinghouse

CB/jf

Attachments

cc: Region G  
Melba McGee, NCDEHNR



State of North Carolina  
Department of Environment,  
Health and Natural Resources  
Legislative & Intergovernmental Affairs

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary  
Henry M. Lancaster II, Director



MEMORANDUM

TO: Chrys Baggett  
State Clearinghouse

FROM: Melba McGee  
Project Review Coordinator

RE: 95-0221 FEIS Greensboro Eastern/Northern Urban Loop,  
Guilford County

DATE: December 22, 1994

Staff from the Department of Environment, Health and Natural Resources have reviewed the proposed project.

Questions continue to remain with the Division of Environmental Management and the N.C. Wildlife Resources Commission. On December 9, 1994, EHNR representatives met with the Department of Transportation to discuss our concerns with the preferred alternative. In our memorandum of October 30, 1992, we stated that each alternative had multiple impacts but divisions seemed to favor the eastern alternative. This department continues to support the eastern alternative and feels the Final Environmental Impact Statement has not satisfactorily addressed our concerns to support the Department of Transportation's preferred alternative. The department withholds final project approval until division comments have been adequately addressed. In order to address these issues the department recommends that a supplemental document be provided by the Department of Transportation for additional review.

Thank you for the opportunity to respond.

attachments

State of North Carolina  
Department of Environment,  
Health and Natural Resources  
Division of Environmental Management

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary  
A. Preston Howard, Jr., P.E., Director



December 9, 1994

MEMORANDUM

To: Melba McGee

Through: John Domey *JD*  
Monica Swihart *MS*

From: Eric Galamb *EG*

Subject: Final EIS Greensboro Eastern/Northern Urban Loop  
Guilford County  
State Project DOT No. 6.498003T, TIP #U-2525  
EHNR # 95-0221, DEM WQ # 10755

The subject document has been reviewed by this office. The Division of Environmental Management is responsible for the issuance of the Section 401 Water Quality Certification for activities which may impact waters of the state including wetlands. The following comments are offered in response to the final EIS prepared for this project which will impact over 8 acres of wetlands.

Melba McGee, David Cox, Richard Davis, Cindy Sharer and I met on December 9, 1994 to discuss several issues related to this project. DEM still prefers the eastern alternative because it has the least impact to high quality wetlands, lowest total wetland impacts and the lowest total cost. In addition, displacements are equal to DOT's preferred alternative (middle).

DEM is concerned that neither the City of Greensboro nor DOT protected the thoroughfare alignment near I-95. If Replacements Limited had not been constructed, the eastern alternative would not have the engineering constraints forcing the middle alignment to be chosen. What measures can be taken to prevent a similar occurrence?

There were no discussions for improvements to US 70 in the DEIS. This prevented our agency from commenting on the alternatives. Therefore, DEM requests that a supplemental document be written to present the wetland quality and quality for the US 70 improvements.

As stated above, DEM prefers the eastern alternative. However, DEM will concur with a middle alternative if DOT commits to install, sign and maintain hazardous spill catch basins at all water supply (WS) stream crossings. In addition, upfront mitigation will be necessary to protect water quality since the wetland impacts on the middle alternative are providing significant uses.

Endorsement of the EIS by DEM does not preclude the denial of a 401 Certification upon application if wetland impacts have not been avoided and minimized to the maximum extent practicable. In addition, endorsement of the EIS does not force an unfavorable concurrence with the two other sections of the Urban Loop.

Questions regarding the 401 Certification should be directed to Eric Galamb.  
gboloop.fei



**GUILFORD COUNTY**  
**PLANNING AND DEVELOPMENT DEPARTMENT**



November 1, 1994

H. Franklin Vick, P.E.  
North Carolina Department of Transportation  
P. O. Box 25201  
Raleigh, North Carolina 27611

RE: **FINAL ENVIRONMENTAL IMPACT STATEMENT (FEIS)**  
**EASTERN/NORTHERN URBAN LOOP**  
**GUILFORD COUNTY, NC TIP NO. U-2525**

Dear Mr. Vick:

This letter is in response to your request for comments to the FINAL EIS for the proposed Eastern/Northern Greensboro Urban Loop from I-85 East to Lawndale Drive.

The principal concerns are as follows:

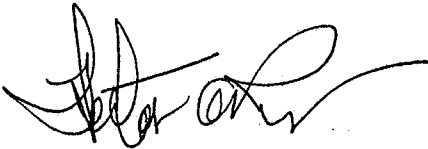
- I) No provision for extending Knox Road across the Eastern Loop to McConnell Road. Public water and sewer have been extended from the south side of I-85 to the northern side to serve Replacements, LTD., thereby, opening up this subbasin to possible future development without public road access. The extension of Knox Road to McConnell Road will also better serve local traffic and reduce the conflict of local traffic and through traffic on I-85/40 in this area.
- II) Option 3 appears to be the best option for the Urban Loop and US-70. By moving US-70 north the two overpass bridges will cross over the railroad tract and US-70 simultaneously, and the bridge(s) construction will be less disruptive to the citizens on the south side of existing US-70. Furthermore, the southbound ramp could be moved so as to intersect with the Urban Loop before crossing the railroad tract. This would eliminate one bridge overpass and reduce cost for Option 3.
- III) Cone Blvd. will be eventually extended as a four (4) lane thoroughfare with a divided median but it is not shown as intersecting at an interchange with the Urban Loop. The Cone Blvd./Hines Chapel Road/Urban Loop interchange needs to be reinstated.

H. Franklin Vick, P.E.  
November 1, 1994  
Page 2

- IV) The entire Eastern Urban Loop from US-29-N to I-85 needs to be constructed as a top priority project, rather than just the I-85 to US-70 portion. Constructing the entire Eastern Loop portion will divert a tremendous amount of traffic off the existing US-29-N thoroughfare and reduce the traffic emptying into "Death Valley" from US-29-N. Constructing the eastern portion of the Urban Loop in conjunction with the southern portion of the Urban Loop would greatly reduce and improve the traffic flow(s) through this portion of I-85 (Death Valley).

It is requested that the above four (4) principal concerns be incorporated into the Final Environmental Impact Statement for the Eastern portion of the Greensboro Urban Loop, TIP No. U-2525. Any questions relating to the details of these four comments may be directed to the Guilford County Planning and Development Department (910/373-3635).

Sincerely,

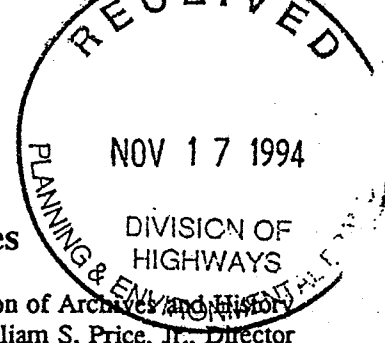


Hector Rivera  
County Manager

/1

cc: County Commissioners  
John Shore, Deputy County Manager  
Jim Elza, Director, Planning and Development  
Mul Wyman, Chief, Planning Division  
Jim Morrison, Senior Planner/Eastern Section  
Keith Pugh, City/County Transportation Engineer

*cc: Davis  
O'Quinn*



## North Carolina Department of Cultural Resources

James B. Hunt, Jr., Governor  
Betty Ray McCain, Secretary

Division of Archives and History  
William S. Price, Jr., Director

November 14, 1994

### MEMORANDUM

TO: H. Franklin Vick, P.E., Manager  
Planning and Environmental Branch  
Division of Highways  
Department of Transportation

FROM: David Brook *for David Brook*  
Deputy State Historic Preservation Officer

SUBJECT: Eastern/Northern Urban Loop from north of  
interchange with I-85 and proposed I-85 bypass east  
of Greensboro to Lawndale Drive north of  
Greensboro, approximately 12.5 miles, State  
6.498003T, TIP U-2525, CH 95-E-4220-0221

We have received information concerning the above project from the State Clearinghouse.

As noted in our memorandums of October 21, 1992 and December 9, 1992 (attached), it is our opinion that Section 106 of the National Historic Preservation Act applies to this project and that use of the Corps of Engineers Appendix C procedures is inappropriate. We again recommend that historic resources surveys be conducted within the area of potential effect to locate potentially eligible sites and properties which may be affected.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966 and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106, codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763.

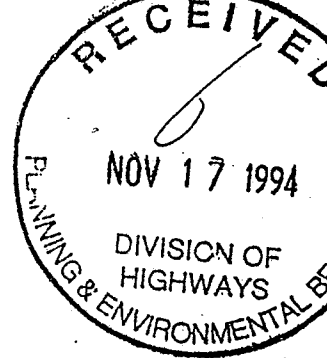
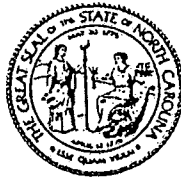
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### Attachments

cc: State Clearinghouse  
T. Padgett  
B. Church







## North Carolina Department of Cultural Resources

James G. Martin, Governor  
Patric Dorsey, Secretary

Division of Archives and History  
William S. Price, Jr., Director

December 9, 1992

### MEMORANDUM

TO: L. J. Ward, P.E., Manager  
Planning and Environmental Branch  
Division of Highways  
Department of Transportation

FROM: David Brook *David Brook*  
Deputy State Historic Preservation Officer

SUBJECT: Greensboro Eastern/Northern Loop, Guilford County,  
U-2525, 6.498003T, GS 93-0033

Thank you for your letter of November 9, 1992, concerning the above project. We hope that this letter provides some clarification regarding our previous comments.

Your letter states that the project will require permit approval from the Army Corps of Engineers (ACOE) and that only these permit areas are subject to compliance with Section 106 of the National Historic Preservation Act. Please note that Section 110(a)(2)(E)(i) of the Fowler Bill (H.R. 429, passed and signed in October 1992) states that the Department of the Army's Appendix C to 33 CFR Part 325 (Processing of DOA Permits: Procedures for the Protection of Historic Properties) must be consistent with the regulations issued by the Advisory Council on Historic Preservation (ACHP). Since the ACHP has not approved the ACOE's Appendix C, we believe that their use is inappropriate.

Section 106 applies to all undertakings requiring federal assistance or approval. Thus, this project's effects upon properties included in or eligible for inclusion in the National Register should be taken into account. While we understand that no National Register-listed properties are located in the area of potential effect, we believe all properties over fifty years of age in the area of potential effect should be identified and evaluated. We look forward to reviewing North Carolina Department of Transportation's findings.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966 and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106, codified at 36 CFR Part 800.

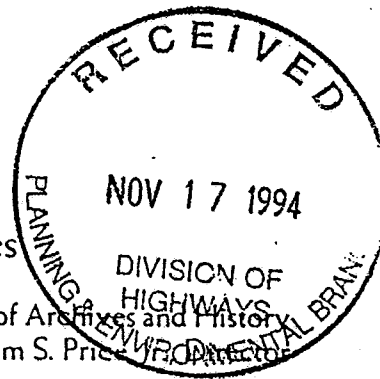
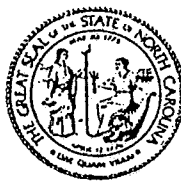
L. J. Ward  
December 9, 1992, Page 2

Thank you for your cooperation and consideration. If you have questions concerning the above comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763.

DB:slw

cc: L. J. Ward  
B. Church  
Army Corps of Engineers, Wilmington

bc: ✓ Highway  
Brown/Stancil  
County  
RF



North Carolina Department of Cultural Resources

James G. Martin, Governor  
Patric Dorsey, Secretary

Division of Archives and History  
William S. Price, Director

October 21, 1992

MEMORANDUM

TO: L. J. Ward, P.E., Manager  
Planning and Environmental Branch  
Division of Highways  
Department of Transportation

FROM: David Brook *David Brook*  
Deputy State Historic Preservation Officer

SUBJECT: Greensboro Eastern/Northern Loop, Guilford County,  
U-2525, 6.498003T, CH 93-E-4220-0202

We have received the draft environmental impact statement for the above project from the State Clearinghouse and would like to comment.

This project requires authorization from both the Army Corps of Engineers and the Federal Highway Administration since federal permits and crossings of interstate highways are necessary. Because all the reasonable and feasible alignments include federal permit areas and crossings of interstate highways, we feel that this project cannot be built without federal approval. Thus, the entire project area is subject to compliance with Section 106 of the National Historic Preservation Act. We recommend that this undertaking be reviewed for possible effects upon properties which may be eligible for National Register-listing.

An archaeological survey of the selected corridor will be necessary to evaluate effects upon eligible properties since the majority of the proposed project area has never been systematically examined by an experienced archaeologist.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966 and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106, codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763.

DB:slw

cc: State Clearinghouse  
Nicholas Graf, Federal Highway Administration  
Col. Walter S. Tulloch, Army Corps of Engineers

bc: Highway  
Southern/Stancil  
Claggett/Hall  
County  
RF



## North Carolina Wildlife Resources Commission

512 N. Salisbury Street, Raleigh, North Carolina 27604-1188, 919-733-3391  
Charles R. Fullwood, Executive Director

### MEMORANDUM

TO: Melba McGee  
Office Of Policy Development, DEHNR

FROM: David Cox, Highway Projects Coordinator  
Habitat Conservation Program *David Cox*

DATE: December 16, 1994

SUBJECT: Final Environmental Impact Statement (FEIS) for  
the Greensboro Eastern/Northern Loop, from north  
of the interchange with I-85 and the proposed I-85  
Bypass east of Greensboro to Lawndale Drive north  
of Greensboro, Guilford County, North Carolina.  
TIP No. U-2525, SCH Project No. 95-0221.

Staff biologists of the N. C. Wildlife Resources Commission (NCWRC) have reviewed the subject FEIS and are familiar with habitat values in the project area. The purpose of this review was to assess project impacts to fish and wildlife resources. Our comments are provided in accordance with certain provisions of the North Carolina Environmental Policy Act (G.S. 113A-1 et seq., as amended; 1 NCAC 25).

The proposed project involves the construction of an urban loop around Greensboro from north of the interchange of I-85 and the proposed I-85 Bypass east of Greensboro to Lawndale Drive (SR 2303) north of Greensboro. Proposed improvements include construction of a multi-lane, full control of access roadway with interchanges at locations with major traffic movements and grade separations at minor crossroads.

The subject document adequately discusses benefits, social impacts, and traffic analysis of the final build alternatives. The document also describes anticipated impacts to natural resources from construction of the

Memo

2

December 16, 1994

preferred alternative. However, the document does not adequately describe impacts that will result from the US 70 improvements nor the justification for selecting the middle alignment as the preferred alternative.

The discussion of the US 70 improvements is also problematic. It is unclear if the wetland impacts associated with the US 70 improvements are included in the totals in Table S-1. Agencies were also not give an opportunity to comment on the selected alternative for the US 70 improvements. A discussion of the need for the US 70 improvements, the reason this is included in U-2525 and not a separate project, and construction methods that would reduce wetland impacts should be included in an addendum to the FEIS. The possibility of removing the existing US 70 bridge over South Buffalo Creek should be also discussed. This site may provide an opportunity for wetland restoration.

The document fails to describe the need for stream relocation/channelization that would result from the proposed construction. We feel that this information would have been useful in our review of this project. A comparison of quality wetland impacts for each alternative and where these impacts occur would have been useful in the alternatives analysis. Further discussion of wetland impact minimization is also recommended.

Due to the selection of the middle alignment as the preferred alternative and the topics that need further discussion, we recommend that this information be presented in an addendum to the FEIS.

Thank you for the opportunity to review and comment on this FEIS. If I can further assist your office, please contact me at (919) 528-9886.

cc: Shari Bryant, District 5 Wildlife Biologist  
Larry Warlick, District 5 Fisheries Biologist

Clayton, N.C.  
October 12, 1994

**MEMORANDUM**

TO: Melba McGee, Policy Development  
FROM: Don H. Robbins, Staff Forester *DHR*  
SUBJECT: DOT FEIS for the Eastern/Northern Urban Loop for Greensboro in Guilford County  
PROJECT: #95-0221, 93-0202, and TIP # U-2525  
DUE DATE: 11-3-94

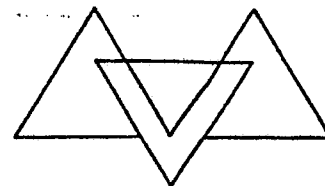
We have reviewed the above subject final document and have the following comments:

1. It looks like the Middle Alternative has been selected as the preferred one.
2. 288 acres of woodland will be impacted. We hope the final design and actual impact will be less.
3. Our forestry concerns have been addressed.
4. We have no further comments at this time.

pc: Warren Boyette - CO  
Vic Owen - D10  
David Henderson - Guilford County  
File

P.S. Vic and David: Attached are the DOT's final comments regarding our forestry concerns for this project. Zippo

PIEDMONT TRIAD COUNCIL OF  
GOVERNMENTS



**Intergovernmental Review Process**

2216 W. Meadowview Road

Greensboro, NC 27407-3480

Telephone: 910-294-4950 Fax: 910-652-0457

**REVIEW & COMMENT FORM**

The State Clearinghouse sent us the enclosed information about a proposal which could affect your jurisdiction. Please circulate it to the people you believe need to be informed.

If you need more information about the proposal, please contact the applicant directly. The name and phone number of a contact person are listed on the attached "Notification of Intent".

If you wish to comment on the proposed action, complete this form and return it to the PTCOG office by **November 7th, 1994.**

We will send your comments to the State Clearinghouse to be included in a recommendation to the proposed funding agency.

State Application Identifier **95-E-4220-0221** **FEIS - Eastern/northern urban loop from north of the interchange with I-85 and the proposed I-85 bypass east of Greensboro to Lawndale Drive north of Greensboro. Cross-reference number: 93-E-4220-0202.**

Commenter's Name & Title **William H. Carstarphen, City Manager**

Representing **Greensboro** Phone # **(910) 373-2002**

Mailing Address **P.O. Box 3136, Greensboro, NC 27402-3136**

*Charles E. Mortimore*  
(signature)

Date Signed **10/20/94**

**COMMENTS: (You may attach additional sheets.)**

*Greensboro Dept. of Transportation previously submitted detailed comments to the State DOT. GDOT would like NCDOT to indicate future interchange with Corridor extension as shown on Greensboro Urban Area Thoroughfare Plan.*

State of North Carolina  
Department of Environment, Health, and Natural Resources

INTERGOVERNMENTAL REVIEW — PROJECT COMMENTS

Reviewing Office:

W5RO

Project Number:

95-0221

Due Date:

11-3-94

After review of this project it has been determined that the EHNR permit(s) and/or approvals indicated may need to be obtained in order for this project to comply with North Carolina Law.

Questions regarding these permits should be addressed to the Regional Office indicated on the reverse of the form.

All applications, information and guidelines relative to these plans and permits are available from the same Regional Office.

All applications, information and guidelines relative to these plans and permits are available from the same Regional Office.		
PERMITS	SPECIAL APPLICATION PROCEDURES or REQUIREMENTS	Normal Process Time (statutory time limit)
Permit to construct & operate wastewater treatment facilities, sewer system extensions, & sewer systems not discharging into state surface waters.	Application 90 days before begin construction or award of construction contracts On-site inspection. Post-application technical conference usual	30 days (90 days)
NPDES - permit to discharge into surface water and/or permit to operate and construct wastewater facilities discharging into state surface waters.	Application 180 days before begin activity. On-site inspection. Pre-application conference usual. Additionally, obtain permit to construct wastewater treatment facility-granted after NPDES Reply time. 30 days after receipt of plans or issue of NPDES permit-whichever is later.	90-120 days (N/A)
Water Use Permit	Pre-application technical conference usually necessary	30 days (N/A)
Well Construction Permit	Complete application must be received and permit issued prior to the installation of a well.	7 days (15 days)
Dredge and Fill Permit	Application copy must be served on each adjacent riparian property owner. On-site inspection. Pre-application conference usual. Filling may require Easement to Fill from N.C. Department of Administration and Federal Dredge and Fill Permit.	55 days (90 days)
Permit to construct & operate Air Pollution Abatement facilities and/or Emission Sources as per 15A NCAC 21H.0600	N/A	60 days (90 days)
Any open burning associated with subject proposal must be in compliance with 15A NCAC 2D.0520.	N/A	60 days (90 days)
Demolition or renovations of structures containing asbestos material must be in compliance with 15A NCAC 2D.0525 which requires notification and removal prior to demolition. Contact Asbestos Control Group 919-733-0820		
Complex Source Permit required under 15A NCAC 2D.0800.		
The Sedimentation Pollution Control Act of 1973 must be properly addressed for any land disturbing activity. An erosion & sedimentation control plan will be required if one or more acres to be disturbed. Plan filed with proper Regional Office (Land Quality Sect.) at least 30 days before beginning activity. A fee of \$30 for the first acre and \$20.00 for each additional acre or part must accompany the plan.		20 days (30 days)
The Sedimentation Pollution Control Act of 1973 must be addressed with respect to the referenced Local Ordinance:		(30 days)
Mining Permit	On-site inspection usual. Surety bond filed with EHNR. Bond amount varies with type mine and number of acres of affected land. Any area mined greater than one acre must be permitted. The appropriate bond must be received before the permit can be issued.	30 days (60 days)
North Carolina Burning permit	On-site inspection by N.C. Division Forest Resources if permit exceeds 4 days	1 day (N/A)
Special Ground Clearance Burning Permit - 22 counties in coastal N.C. with organic soils	On-site inspection by N.C. Division Forest Resources required "If more than five acres of ground clearing activities are involved. Inspections should be requested at least ten days before actual burn is planned."	1 day (N/A)
Oil Refining Facilities	N/A	90-120 days (N/A)
Dam Safety Permit	If permit required, application 60 days before begin construction. Applicant must hire N.C. qualified engineer to prepare plans. Inspect construction during construction to be according to EHNR approved plans. May also require permit under mosquito control program. And a 404 permit from Corps of Engineers. An inspection of site is necessary to verify Hazard Classification. A minimum fee of \$200.00 must accompany the application. An additional processing fee based on a percentage of the total project cost will be required upon completion.	30 days (60 days)